

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE	:	CHAPTER 13
	:	
PATRICIA M. HALSEY	:	
A/K/A PATRICIA KLEE	:	CASE NO: 19-11696 AMC
	:	
Debtor	:	
_____	:	

**STIPULATION AND ORDER**

AND NOW, IT IS HEREBY STIPULATED AND AGREED to by and between the Debtor, Patricia M. Halsey a/k/a Patricia Klee, and U.S. Bank, National Association, as Trustee for the Bear Stearns Asset Backed Securities Trust 2001-3, Asset-Backed Certificates, Series 2001-3, as follows:

1. On May 29, 2019, U.S. Bank, National Association, as Trustee for the Bear Stearns Asset Backed Securities Trust 2001-3, Asset-Backed Certificates, Series 2001-3 filed a secured Proof of Claim, Claim No. 1, in the amount of \$296,987.99.

2. On August 26, 2019, Debtor filed an Objection to the Claim (Doc. No. 31).

3. Upon approval by the United States Bankruptcy Court of the within Stipulation, Debtor and secured creditor, U.S. Bank, National Association, as Trustee for the Bear Stearns Asset Backed Securities Trust 2001-3, Asset-Backed Certificates, Series 2001-3, agree to the following:

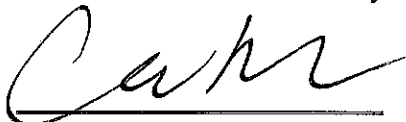
a. Debtor shall submit a substantially complete loss mitigation application by February 29, 2020.

b. Additionally, beginning on February 1, 2020, Debtor shall also make regular post-petition payments on the first (1<sup>st</sup>) of each month in accordance with the

terms of the note and mortgage while the loan modification application is pending.

- c. If a timely trial modification is obtained by May 15, 2020, Debtor shall then continue to make regular trial modification payment followed by regular permanent modification payments thereafter, both as directed within the modification documents.
- d. If either Debtor fails to make any of the referenced post-petition payments or fails to receive either a trial or permanent modification within the above agreed upon time frame, Movant may proceed with filing a Motion for Relief from the

Automatic Stay.



GARY E. THOMPSON  
Attorney for Debtor

/s/ Rebecca A. Solarz, Esquire

REBECCA A. SOLARZ  
Attorney for Secured Creditor

SO ORDERED:

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Ashely M. Chan  
United States Bankruptcy Court